## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS **HOUSTON DIVISION**

IN RE:	§	CHAPTER 11
	§	CASE NO. 22-33553
ALEXANDER E. JONES	<b>§</b>	
Debtor	§	Hearing Date: 12/9/24 at 1:00 p.m.
	§	
	<b>§</b>	Nature of Proceeding:
	<b>§</b>	Trustee's Expedited Motion for Entry of an
	<b>§</b>	Order in Furtherance of the Sale of Assets
	§	of Free Speech Systems, LLC [Doc. 915]

### FIRST UNITED AMERICAN COMPANIES, LLC'S AMENDED WITNESS AND EXHIBIT LIST

### Witness List:

D. D. D.

- 1. Christopher Murray
- 2. Jeff Tanenbaum
- 3. Alex Jones
- 4. Ben Collins
- 5. Christopher M. Mattei
- 6. Representative of Global Tetrahedron, LLC
- 7. Representative of War Is Over, LLC
- 8. Representative of Connecticut Families
- 9. Representative of First United American Companies, LLC
- 10. Walter J. Cicack
- 11. Any witness called by any other party

#### **Exhibit List:**

NO.	DESCRIPTION	Offered	Objection	Admitted/ Not Admitted
1.	Order Granting Trustee's Motion for Entry of an Order Authorizing the Winddown of Free Speech Systems, LLC (Dkt. 859)			
2.	Notice of Successful Bidder and Backup Bidder in the Auction for the Assets of Free Speech Systems, LLC Free and Clear of Any and All Claims, Interests, and Encumbrances (Dkt. 903)			
3.	FUAC's Initial Bid			
4.	Onion's Initial Bid			

NO.	DESCRIPTION	Offered	Objection	Admitted/ Not Admitted
5.	Email from Jeff Tanenbaum of Tranzon, dated November 11, 2024			
6.	New Overbid Form			
7.	FUAC's Bid (Designated as Backup Bid)			
8.	Onion's Bid with 3-page letter of explanation (Designated as Success Bid)			
9.	Sealed Bid Package (Dkt. 915-2)			
10.	Asset Purchase Agreement (Dkt. 915-1)			
11.	PQPR's Proof of Claim (POC No. 11)			
12.	Debtor's Consolidated Objection to Proofs of Claim filed by Connecticut Plaintiffs (Dkt. 705)			
13.	Connecticut Families' Response to Claim Objection (Dkt. 812)			
14.	Tranzon 235-236			
15.	Tranzon 699-701			
16.	Tranzon 703			
17.	Tranzon 795			
18.	Tranzon 796-811			
19.	Tranzon 812-827			
20.	Tranzon 828-843			
21.	Tranzon 844-868			
22.	Tranzon 869-884			
23.	Tranzon 885-888			
24.	Tranzon 889-892			
25.	Tranzon 893			

NO.	DESCRIPTION	Offered	Objection	Admitted/ Not Admitted
26.	Trustee's Motion for Entry of an Order Authorizing the Winddown of Free Speech Systems, LLC (Dkt. 829)			
27.	Proposed (I) Order Approving Asset Purchase Agreement, (II) Authorizing Sale of Purchased Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, and (III) Granting Other Related Relief (Dkt. 974)			
28.	Proposed (I) Order Approving Asset Purchase Agreement, (II) Authorizing Sale of Purchased Assets Free and Clear of All Liens, Claims, Encumbrances, and Other Interests, and (III) Granting Other Related Relief (Dkt. 915-8)			
29.	Liberman email dated 11/15/2024 (with attachment)			
30.	Wolfshohl letter dated 12/8/2024			
31.	Redlined Term Sheet			
32.	Term Sheet			
33.	Statement of the Texas Plaintiffs on the Chapter 7 Trustee's Expedited Motion for Entry of an Order in Furtherance of the Sale of Assets of Free Speech Systems, LLC (Dkt. 961)			
34.	Cicack Ltr to Wolfshohl dated 12/6/2024			
35.	Any admitted documents offered by another party			
36.	Rebuttal documents			

Respectfully submitted,

/s/ Walter J. Cicack
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Attorneys for First United American

# Companies, LLC

# **Certificate of Service**

I hereby certify that a true and correct copy of the foregoing document has been served through the Court's ECF noticing system on this  $9^{th}$  day of December, 2024.

<u>/s/ Walter J. Cicack</u>
Walter J. Cicack